

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED.



UNITED STATES OF AMERICA

v.

MARIO ALBERTO RENTERIA-GONZALEZ

No. 3:08-00139
JUDGE TRAUGER

MOTION TO CONTINUE TRIAL AND RELATED DEADLINES

Mario Alberto Renteria-Gonzalez, through counsel, respectfully moves the Court to continue his trial which is currently scheduled to begin on Tuesday, November 25, 2014, as well as to extend related deadlines. Counsel has been in discussions with Mr. Renteria-Gonzalez and the Government regarding an Indictment returned in the Southern District of Texas. Most recently, counsel met with Mr. Renteria-Gonzalez this date and further discussed his options with respect to the instant case and the impact of the Indictment from the Southern District of Texas. Given the added dimension of the Texas Indictment, counsel has spent much of his discussions explaining Mr. Renteria-Gonzalez's options and decisions which may or may not be made with respect to Texas officials. This has detracted from much of the preparation that would have been done in the instant case. In consultation with Mr. Renteria-Gonzalez, it has been determined that another continuance must be requested, but counsel is confident this should be the last such request. Mr. Renteria-Gonzalez will likely enter a guilty plea, but requires additional time to discuss issues with counsel and review documents associated with such plea.

A waiver prepared under the Middle District of Tennessee's Plan for the Prompt Disposition of Criminal Cases is filed contemporaneously with this motion. It is respectfully requested that the delay occasioned by the filing and granting of this motion be excluded from the time in which trial must commence pursuant to 18 U.S.C. § 3161(h)(7)(A), in that the ends of justice served by the granting of a continuance, outweigh the best interests of the public and the defendant in a speedy trial.